



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

APRIL 19, 1990

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

MEMORANDUM

SUBJECT: Interpretation Request

FROM: David O'Brien, Chief Standards Branch /s/

TO: Gerald. Phillips, Chief  
Office of UST/LUST, Region V

This is in response to your request of March 26, 1990, regarding the underground storage of 3 products (Alkylate H-230H, Aristol 360, and, Aristol 400) comprised of a mixture of the C14-C30 alkyl derivatives of benzene.

These substances are not regulated under 40 CFR Part 280.

These substances are not listed under section 101(14) CERCLA. Benzene is present in trace or de minimus quantities, which does not effect their status as non-regulated substances.

These substances do not belong in one of the general categories of petroleum -- motor fuel, jet fuel, distillate fuel oil, residual fuel, oil, lubricant, petroleum solvent, or used oil; are not a fraction of petroleum or crude oil; and are not derived from crude oil through processes of separation, conversion, upgrading, and finishing,

These substances are called "petroleum oil" for freight purposes because of their petroleum-like properties -- they are viscous, oily, less dense than water, and practically insoluble in water. They are also non-flammable and are used in the manufacture of detergents.

If you have any further questions please contact Mike Kalinoski 8-382-4759.